

FILED
CHARLOTTE, N.C.

MAY 29 2008

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO. 3:08CR34**

U.S. DISTRICT COURT
W. DIST. OF N.C.

UNITED STATES OF AMERICA,

UNDER SEAL

SUPERSEDING BILL OF INDICTMENT

Plaintiff,

Violations:

18 U.S.C. § 371

18 U.S.C. § 1201

18 U.S.C. § 1591

v.

18 U.S.C. § 2421

18 U.S.C. § 2423

18 U.S.C. § 2

8 U.S.C. § 1324(a)(1)(A)(ii)

JORGE FLORES-ROJAS.

Defendant.

THE GRAND JURY CHARGES:

COUNT ONE

In or around November 2007, and continuing to on or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

and others known and unknown to the Grand Jury, unlawfully combined, conspired, confederated, and agreed to commit against the United States the following offenses:

- A. recruiting, enticing, harboring, transporting, providing and obtaining by any means and benefit, financially, or by receiving anything of value, from participating in a

venture, a minor female, "F.C.," knowing that the minor female had not attained the age of 18 years, and knowing that the minor female would be caused to engage in a commercial sex act, in violation of Title 18, United States Code Section 1591(a)(1);

- B. knowingly transporting a minor female, "F.C.," who has not attained the age of 18 years in interstate commerce with the intent that the minor female engage in prostitution, in violation of Title 18, United States Code, Section 2423(a); and
- C. knowingly transporting an individual, that is, "C.C.," in interstate or foreign commerce with the intent that "C.C." engage in prostitution, in violation of Title 18, United States Code Section 2421(a).

MANNER AND MEANS

JORGE FLORES-ROJAS, unindicted co-conspirators and others known and unknown to the Grand Jury carried out the conspiracy in the manner and means as described in Paragraphs 1-11 of the "Overt Acts" section of this Superseding Indictment, which is re-alleged and incorporated by reference as if fully set forth herein.

OVERT ACTS

In furtherance of the conspiracy and to promote its objects, **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury committed and caused to be committed various overt acts during the conspiracy in Mecklenburg County, within the Western District of North Carolina and elsewhere, including one or more of the following:

1. In or around November 2007, defendant **JORGE FLORES-ROJAS** communicated with others known and unknown to the Grand Jury about

prostitution services to customers in the Washington, D.C. area to be provided by a minor female, "F.C.."

2. In or around November 2007, defendant **JORGE FLORES-ROJAS** communicated with others known and unknown to the Grand Jury about prostitution services to customers in the Washington, D.C. area to be provided by "C.C.."
3. In or around November 2007, defendant **JORGE FLORES-ROJAS** drove the minor female, "F.C.," from the Western District of North Carolina to Washington, D.C. so that she could engage in commercial sex acts.
4. In or around November 2007, defendant **JORGE FLORES-ROJAS** drove "C.C.," from the Western District of North Carolina to Washington, D.C. so that she could engage in commercial sex acts.
5. In or around November 2007 through in or around December 2007, defendant **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury instructed the female minor, "F.C.," regarding how much she should charge for various sex acts. Specifically, defendant **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury told the minor female, "F.C.," that the rate she should charge in the Washington, D.C. area was \$25.00 per fifteen minute period of sexual contact with each customer.
6. In or around November 2007 through in or around December 2007, defendant **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury instructed "C.C.," regarding how much she should charge for various sex acts.

Specifically, defendant **JORGE FLORES-ROJAS** with others known and unknown to the Grand Jury told "C.C." that the rate she should charge in the Washington, D.C. area was \$25.00 per fifteen minute period of sexual contact with each customer.

7. In or around November 2007 and continuing through in or around December 2007, defendant **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury collected the money the female minor, "F.C.", earned for performing sex acts.
8. In or around November 2007 through in or around December 2007, defendant **JORGE FLORES-ROJAS** and others known and unknown to the Grand Jury collected the money that "C.C.", earned for performing sex acts.
9. In or around November 2007 through in or around December 2007, persons known and unknown to the Grand Jury distributed business cards that advertised, in coded language, the availability of prostitution services from females working as prostitutes, including the minor female, "F.C." and the individual, "C.C."
10. In or around November 2007 through in or around December 2007, persons known and unknown to the Grand Jury received and accepted phone calls from customers seeking the services of prostitutes.
11. In or around November 2007 through in or around December 2007, persons known and unknown to the Grand Jury drove the minor female, "F.C." and "C.C." to residences, hotels and other locations so they could provide prostitution services.

All in violation of Title 18, United States Code Section 371.

COUNT TWO

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

and others known and unknown to the Grand Jury, knowingly, in or affecting interstate or foreign commerce, recruited, enticed, harbored, transported, provided and obtained by any means; or benefitted financially, or by receiving anything of value, from participation in a venture, "F.C.," a minor under the age of 18 years, knowing that "F.C." had not attained the age of 18 years, and knowing that "F.C." would be caused to engage in a commercial sex act, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 1591 and 2.

COUNT THREE

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

knowingly, in or affecting interstate or foreign commerce, recruited, enticed, harbored, transported, provided and obtained by any means; or benefitted financially, or by receiving anything of value, from

participation in a venture, "S.M.", a minor under the age of 18 years, knowing that "S.M." had not attained the age of 18 years, and knowing that "S.M." would be caused to engage in a commercial sex act, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 1591 and 2.

COUNT FOUR

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted and carried away and held for ransom or reward or otherwise, "S.M.", when the minor was willfully transported in interstate commerce and the defendant traveled in interstate commerce in furtherance of the commission of the offense, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 1201 and 2.

COUNT FIVE

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

and others known and unknown to the Grand Jury, knowingly transported an individual, that is, "C.C.," in interstate or foreign commerce, from the Western District of North Carolina to Washington, D.C., with the intent that "C.C." engage in prostitution, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 2421 and 2.

COUNT SIX

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

JORGE FLORES-ROJAS

and others known and unknown to the Grand Jury, knowingly transported an individual, that is, "F.C.," who had not attained the age of 18 years, in interstate or foreign commerce, from the Western District of North Carolina to Washington, D.C., with the intent that "F.C." engage in prostitution, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 2423 and 2.

COUNT SEVEN

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere

JORGE FLORES-ROJAS

knowingly transported an individual, that is, "S.M.", who had not attained the age of 18 years, in interstate or foreign commerce, from Washington, D.C. to the Western District of North Carolina, with the intent that "S.M." engage in prostitution, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 18, United States Code Sections 2423 and 2.

COUNT EIGHT

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere

JORGE FLORES-ROJAS

knowing or in reckless disregard of the fact that "F.C." has come to, entered, or remained in the United States in violation of law, transported or moved such alien within the United States by means of transportation or otherwise, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

All in violation of Title 8, United States Code Sections 1324(a)(1)(A)(ii) and 2.

COUNT NINE

The Grand Jury realleges and incorporates by reference the allegations of this Superseding Bill of Indictment.

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere

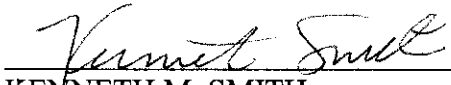
JORGE FLORES-ROJAS

knowing or in reckless disregard of the fact that "C.C." has come to, entered, or remained in the United States in violation of law, transported or moved such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

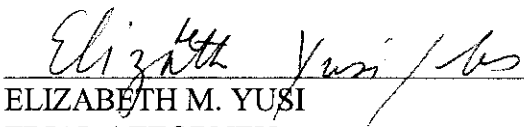
All in violation of Title 8, United States Code Sections 1324 (a)(1)(A)(ii) and 2.

A TRUE BILL

GRETCHEN C. F. SHAPPERT
UNITED STATES ATTORNEY


KENNETH M. SMITH
ASSISTANT UNITED STATES ATTORNEY


CORTNEY ESCARAVAGE
ASSISTANT UNITED STATES ATTORNEY


ELIZABETH M. YUSI
TRIAL ATTORNEY
CHILD EXPLOITATION AND OBSCENITY SECTION
UNITED STATES DEPARTMENT OF JUSTICE